

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA**

BROCK FREDIN,

Plaintiff,

--against--

LINDSEY MIDDLECAMP

Defendant.

Case No. 19-CV-3058

**NOTICE OF RULE 11 SANCTIONS
MOTION**

TO: Karl Johann Breyer
60 South 6th St, #3400
Minneapolis, MN 55402
Counsel for Lindsey Middlecamp

TAKE NOTICE that as soon as the [c]ourt deems proper, or as soon as can be heard,

Plaintiff Brock Fredin will move the [c]ourt for an order:

1. Fed. R. Civ. P. Rule 11 sanctions asserted against Defendant Middlecamp and Karl Johann Breyer;
2. Sanctions asserted against the Defendant Middlecamp's sandbagging attempts to introduce of new issues and evidence in two (2) sham declarations to defeat depositions or cross examination; [Dock No. 193-197.]
3. Sanctions asserted against Karl Johann Breyer and Defendant Middlecamp's knowingly false statements. [Dock No. 185.]
 - a) The information contained in this document and the enclosed Memorandum of Law is true and correct to the best of my knowledge;
 - b) I have not been determined by any court to be a frivolous litigant and I am not the subject of an order precluding me from serving or filing this document;

- c) I am not serving or filing this document for any improper purpose, such as to harass the other party or to cause delay or needless increase in the cost of litigation or to commit a fraud on the court; and
- d) I understand that the court can order me to pay money to the other party, including the reasonable expenses incurred by the other party if the above statements are not true.

The grounds for this motion are as stated in the attached Memorandum of Law.

Dated: September 4, 2020

s/ Brock Fredin
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Plaintiff, Pro Se